

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-17 are currently pending in this application. Claims 1, 7, and 12 are independent. The remaining claims depend, directly or indirectly, from claims 1, 7, and 12.

Rejections under 35 U.S.C. § 102

Claims 1-3 and 5-17 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Publication No. 2002/0087628 ("Rouse"). This rejection is respectfully traversed.

The present invention is directed toward providing customized electronic mail (e-mail) to portable electronic devices. Specifically, the present invention includes a portal server that receives a request for mail functions from a client. In response to the request, a Java Server Page (JSP) corresponding to the request is accessed. JSPs are normal HTML pages with Java code embedded in them (as accessible tags) (*see, e.g.*, Publication of present application, paragraph [0036]). The term "Java Server Page" generally refers to an extension of the Java servlet technology from Sun Microsystems, Inc. that provides a standardized programming vehicle for displaying dynamic content on a Web page (*see, e.g.*, Publication of present application, paragraph [0036]). For example, a typical JSP includes both HTML and embedded Java™ source code that is executed in a web server. Thus, it is clear that JSPs were very well-known tools at the time of the invention, and useful for building dynamic Web sites and accessing database information on a Web server. Further, a JSP contains information required to define

the look and feel of a web page as viewed by a user (*e.g.*, via a Web browser) (*see, e.g.*, Publication of present application, paragraph [0032]).

Turning to the rejection of the claims, for anticipation under 35 U.S.C. § 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Any feature not directly taught must be inherently present. The Applicant respectfully asserts that Rouse does not teach or suggest the limitations recited in the independent claims of the present invention.

Specifically, Rouse fails to disclose or suggest “accessing a JSP corresponding to a client request for mail” as recited in the claims. The Examiner asserts that the page (*i.e.*, content page) generated by the page generator (218 in Figure 2 of Rouse) is equivalent to a JSP (*see, e.g.*, Office Action mailed November 18, 2005, page 2). Applicant respectfully and wholeheartedly disagrees.

First, the page generator of Rouse creates content pages, such as WML decks, which may be sent to a wireless device. Rouse is completely silent with respect to the content pages being JSPs, which are a specific type of server page that contains *Java™ embedded code* (by definition). In fact, Rouse discloses that the page generator creates content pages in Extensible Markup Language (“XML”) (*see, e.g.*, Rouse, paragraph [0046]). There is no mention of *Java™ or Java embedded code* in the content pages created by the page generator. Although the content pages disclosed by Rouse are sent to a wireless device for display, the content pages are not JSPs.

In addition, the Examiner’s attempt to equate the content pages disclosed by Rouse to the Java server page recited in the claims requires the Examiner to improperly read out an express

limitation of the claims. If the Applicant had intended for the claim scope to be broad enough to include the content page taught by Rouse, the Applicant would have merely claimed a server page. Instead, the Applicant's recited claims include a specific type of page, namely a "Java server page." Accordingly, this express limitation should not be improperly read out of the claim by the Examiner.

Even assuming *arguendo* that the content pages disclosed in Rouse are equivalent to JSPs, Rouse also fails to disclose or suggest "accessing a plurality of tags contained within the JSP" as recited in the claims. Tags in the JSP are used to provide functionality for a group of servers (*see, e.g.*, Publication of present application, paragraph [0034]). That is, each tag that is accessed within the JSP provides functionality for one or more servers. The Applicant asserts that the Examiner improperly attempts to equate the "functionality of viewing, searching, and forwarding messages to other recipients" found in Rouse with accessing tags contained within a JSP claimed in the present invention (*see, e.g.*, Office Action mailed November 18, 2005, page 2). However, merely having the viewing, search, and forwarding functionalities as disclosed in Rouse does not teach accessing anything *within the content page* generated in Rouse, much less the tags recited in the claims. Actually, the content page taught by Rouse has nothing to do with the aforementioned mail functions. The discussion of the mail functions are three pages removed from the discussion of content pages and completely unrelated. In fact, Rouse is completely silent with respect to the content page containing any tags. Again, the Examiner has attempted to improperly read out another express limitation of the claims, namely the words "tags contained within."

Due to the fact that Rouse does not disclose accessing a JSP or tags contained within the JSP, it also follows that Rouse fails to disclose or suggest "processing a JSP using the tags to

access a mail server for providing the mail functions” as recited in the claims. In fact, it does not make sense that Rouse would need to disclose the aforementioned limitation.

In view of the above, it is clear that Rouse fails to disclose or suggest each and every limitation of independent claim 1. Independent claims 7 and 12 include similar allowable subject matter and are thus patentable over Rouse for at least the same reasons as independent claim 1. Dependent claims are patentable for at least the same reasons as well. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. § 103

Claim 4 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Rouse in view of U.S. Patent No. 5,948,058 (“Kudoh”). This rejection is respectfully traversed.

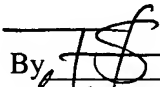
As described above, Rouse fails to disclose or suggest each and every limitation of independent claim 1. Further, Kudoh fails to supply that which Rouse lacks, as evidenced by the fact that the Examiner relies on Kudoh solely for the purpose of disclosing extended mail functions by accessing extended tags in the JSP (*see, e.g.*, Office Action mailed November 18, 2005, page 5). In view of the above, it is clear that independent claim 1 is patentable over Rouse and Kudoh, whether considered separately or in combination. Dependent claim 4, which depends from claim 1, is patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226.440001).

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Respectfully submitted,

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